

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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| UNITED STATES OF AMERICA, | : | CASE NO. 3:24-CR-65 |
| | : | |
| Plaintiff, | : | MICHAEL J. NEWMAN |
| | : | |
| v. | : | |
| | : | <u>INDICTMENT</u> |
| CHRISTOPHER JEWETT | : | 18 U.S.C. § 2251(a) and (e) |
| | : | 18 U.S.C. § 2422(b) |
| | : | 18 U.S.C. § 2252(a)(2) and (b)(1) |
| Defendant. | : | 18 U.S.C. § 1470 |
| | : | 18 U.S.C. § 2260A |
| | : | 18 U.S.C. § 2252(a)(4)(B) and (b)(2) |

THE GRAND JURY CHARGES THAT:

COUNT 1: Coercion and Enticement (Minor A)
[18 U.S.C. § 2422(b)]

During a period of time beginning on or about June 24, 2023, through June 28, 2023, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, did use any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce any individual, to wit: Minor A, who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense.

All in violation of Title 18 United States Code Section 2422(b).

COUNT 2: Transfer of Obscene Material (Minor A)
[18 U.S.C. § 1470]

On or about June 25, 2023, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, did, by means of interstate commerce, knowingly transfer or attempt to transfer obscene matter to another individual, to wit: minor A, who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years.

All in violation of Title 18, United States Code, Section 1470.

COUNT 3: Receipt of Child Pornography – Prior Conviction (Minor A)
[18 U.S.C. § 2252(a)(2) and (b)(1)]

On or about June 26, 2023, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, knowingly received any visual depiction using any means or facility of interstate or foreign commerce, that has been mailed, shipped and transported in or affecting interstate or foreign commerce, by any means including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct.

At the time **CHRISTOPHER JEWETT** received such visual depictions, he had been convicted of a prior offense under the laws of the State of Ohio relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward for purposes of 18 U.S.C. § 2252(b)(2); namely, on or about April 21, 2020, in the Montgomery County Common Pleas Court (Ohio), case number 2019CR3210, **JEWETT** was convicted of two counts of Unlawful Sexual Conduct with a Minor, in violation of O.R.C. § 2907.04(A)(5).

All in violation of Title 18 United States Code Section 2252(a)(2) and (b)(1).

COUNT 4: Production of Child Pornography – Prior Conviction (Minor A)
[18 U.S.C. § 2251(a) and (e)]

On or about June 28, 2023, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, did employ, use, persuade, induce, entice, and coerce any minor, to wit: Minor A, to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing a visual depiction of such conduct and such visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction

has actually been transported or transmitted using any means or facility of interstate or foreign commerce, or in and affecting interstate or foreign commerce or mailed.

At the time **CHRISTOPHER JEWETT** produced such visual depictions, he had been convicted of a prior offense under the laws of the State of Ohio relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward for purposes of 18 U.S.C. § 2252(b)(2); namely, on or about April 21, 2020, in the Montgomery County Common Pleas Court (Ohio), case number 2019CR3210, **JEWETT** was convicted of two counts of Unlawful Sexual Conduct with a Minor, in violation of O.R.C. § 2907.04(A)(5).

All in violation of Title 18 United States Code Section 2251(a) and (e).

COUNT 5: Offense by a Registered Sex Offender (as to Minor A)
[18 U.S.C. § 2260A]

During a period of time beginning on or about June 24, 2023, through June 28, 2023, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, being required by Federal or other law to register as a sex offender, committed a felony offense involving a minor under 18 USC § 2251; namely, the felony offenses charged in Counts One and Four of this Indictment.

All in violation of Title 18 United States Code Section 2260A.

COUNT 6: Coercion and Enticement (Minor B)
[18 U.S.C. § 2422(b)]

During a period of time beginning on or about April 17, 2024, through May 2, 2024, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, did use any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce any individual, to wit: Minor B, who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with an offense.

All in violation of Title 18 United States Code Section 2422(b).

COUNT 7: Production of Child Pornography – Prior Conviction (Minor B)
[18 U.S.C. § 2251(a) and (e)]

On or about April 29, 2024, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, did employ, use, persuade, induce, entice, and coerce any minor, to wit: Minor B, to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), for the purpose of producing a visual depiction of such conduct and such visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce, or in and affecting interstate or foreign commerce or mailed.

At the time **CHRISTOPHER JEWETT** produced such visual depictions, he had been convicted of a prior offense under the laws of the State of Ohio relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward for purposes of 18 U.S.C. § 2252(b)(2); namely, on or about April 21, 2020, in the Montgomery County Common Pleas Court (Ohio), case number 2019CR3210, **JEWETT** was convicted of two counts of Unlawful Sexual Conduct with a Minor, in violation of O.R.C. § 2907.04(A)(5).

All in violation of Title 18 United States Code Section 2251(a) and (e).

COUNT 8: Offense by a Registered Sex Offender (as to Minor B)
[18 U.S.C. § 2260A]

During a period of time beginning on or about April 17, 2024, through May 2, 2024, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, being required by Federal or other law to register as a sex offender, committed a felony offense involving a minor under 18 USC § 2251; namely, the felony offenses charged in Counts Six and Seven of this Indictment.

All in violation of Title 18 United States Code Section 2260A.

COUNT 9: Possession of Child Pornography – Prior Conviction
[18 U.S.C. § 2252(a)(4)(B) and (b)(2)]

On or about June 29, 2023, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, knowingly possessed or accessed with the intent to view at least one matter which contains any visual depiction that has been mailed, shipped and transported using any means and facility of interstate or foreign commerce, including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduction.

At the time **CHRISTOPHER JEWETT** possessed such visual depictions, he had been convicted of a prior offense under the laws of the State of Ohio relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward for purposes of 18 U.S.C. § 2252(b)(2); namely, on or about April 21, 2020, in the Montgomery County Common Pleas Court (Ohio), case number 2019CR3210, **JEWETT** was convicted of two counts of Unlawful Sexual Conduct with a Minor, in violation of O.R.C. § 2907.04(A)(5).

All in violation of Title 18 United States Code Section § 2252(a)(4)(B) & (b)(2).

COUNT 10: Possession of Child Pornography – Prior Conviction
[18 U.S.C. § 2252(a)(4)(B) and (b)(2)]

On or about May 2, 2024, in the Southern District of Ohio, the defendant, **CHRISTOPHER JEWETT**, knowingly possessed or accessed with the intent to view at least one matter which contains any visual depiction that has been mailed, shipped and transported using any means and facility of interstate or foreign commerce, including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduction.

At the time **CHRISTOPHER JEWETT** possessed such visual depictions, he had been convicted of a prior offense under the laws of the State of Ohio relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward for purposes of 18 U.S.C. § 2252(b)(2); namely, on or about April 21, 2020, in the Montgomery County Common Pleas Court (Ohio), case number 2019CR3210, **JEWETT** was convicted of two counts of Unlawful Sexual Conduct with a Minor, in violation of O.R.C. § 2907.04(A)(5).

All in violation of Title 18 United States Code Section § 2252(a)(4)(B) & (b)(2).

FORFEITURE ALLEGATION

Upon conviction of any offense set forth in this Indictment, the defendant, **CHRISTOPHER JEWETT**, shall forfeit to the United States pursuant to 18 U.S.C. § 2253(a): (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B or 2260 of Chapter 110 of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18 of the United States Code; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property, including but not limited to:

(1) Black Apple iPhone in protective case.

(2) Motorola Moto G Play Cellular Telephone bearing IMEI 355344823164176

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b), to seek forfeiture of any other property of the defendant, up to the value of the property described above.

A TRUE BILL


FOREPERSON

KENNETH L. PARKER
United States Attorney


JAHAN KARAMALI
Assistant United States Attorney